



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*610 Federal Plaza  
Central Islip, New York 11722*

JHK:DCL

July 19, 2016

Honorable Joseph F. Bianco  
United States District Court  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Kenner and Constantine  
CR-13-607 (S-2)

Dear Judge Bianco:

The undersigned writes to respectfully requests that the time to submit the government's forfeiture brief be extended from July 20, 2016 to a later date dependent upon the appointment of new counsel for defendant Kenner. By letter dated July 13, 2016 (Docket Entry 386), defendant Kenner sought to have the Court appoint new counsel and also provided the Court with a compact disc of "voluminous reports and exhibits" with regard to the forfeiture. A copy of the compact disc has not been provided to the undersigned. Prior to the submission of a brief, the government requests the opportunity to review the submission.

Accordingly, the government respectfully requests that the Court address the timing of the government's submission at the status conference currently scheduled for July 20, 2016.

Thank you for your courtesies in this matter.

Respectfully submitted,

ROBERT L. CAPERS  
United States Attorney

By: /s/ Diane C. Leonardo  
Diane C. Leonardo  
Assistant U.S. Attorney  
(631) 715-7854

cc: Defense counsel by ECF